IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF ARKANSAS FORT SMITH DIVISION

DR. KENNETH A. HEILES,

PLAINTIFF,

v. CASE NO. 2:17-CV-2194

ARKANSAS COLLEGES OF HEALTH EDUCATION d/b/a ARKANSAS COLLEGE OF OSTEOPATHIC MEDICINE,

DEFENDANT.

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff, Dr. Kenneth A. Heiles, by and through his attorneys, David S. Mitchell, Jr., Rose Law Firm, P.A., and Defendant, Arkansas College of Health Education d/b/a Arkansas College of Osteopathic Medicine, by and through its attorneys, Gilker and Jones, P.A., jointly submit their Motion to Extend Discovery Deadline. In support of their Motion, the parties state as follows:

- 1. Paragraph 2 of the Court's Final Scheduling Order requires the parties to complete discovery on or before June 12, 2018.
- Due to certain scheduling issues regarding Plaintiff's deposition as well as the deposition of Defendant's witnesses, the parties request that the discovery deadline be extended from June 12, 2018 to June 22, 2018.
- 3. This Motion is made in good faith and not for purposes of delay or any other improper purpose.
- 4. Pursuant to Local Rule 72., no Brief is required in connection with this Motion.
 WHEREFORE, the parties jointly request that the Court grant this Motion to Extend the
 Discovery deadline from June 12, 2018 to June 22, 2018.

Jointly submitted on this 10th day of May, 2019

Dr. KENNETH A. HEILES, Plaintiff

By: /s/David S. Mitchell, Jr.

David S. Mitchell, Jr., Ark. Bar No. 2010271

Rose Law Firm, P.A. 120 East Fourth Street Little Rock, Arkansas 72201 Telephone: (501) 377-0317

E-mail: dmitchell@roselawfirm.com

Attorney for Plaintiff

Arkansas Colleges of Health Education d/b/a Arkansas College of Osteopathic Medicine, Defendant

By: /s/Joseph F. Gilker

Joseph F. Gilker, Ark. Bar No. 85219 GILKER AND JONES, P.A. 9222 North Highway 71 Mountainburg, Arkansas 72946

Telephone: (479) 369-4294 E-mail: <u>gilkerlaw@aol.com</u>

Attorney for Defendant

CERTIFICATE OF SERVICE

I, Joseph F. Gilker hereby certify that I have served a true and correct copy of the foregoing JOINT MOTION TO EXTEND DISCOVERY DEADLINE upon the below named individual by filing same with the Court using the CM/ECF system, which will serve electronic notice of filing on the following individual, this 10th day of May, 2017.

David S. Mitchell, Jr.
Rose Law Firm, P.A.
120 East Fourth Street
Little Rock, Arkansas 72201
dmitchell@roselawfirm.com

By: <u>/s/Joseph F. Gilker</u> Joseph F. Gilker